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COSTCO WHOLESALE CORPORATION

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MEIZHEN WANG, individually,

Case No. 2:23-cv-01097-JAD-BNW

Plaintiff,

v.

COSTCO WHOLESALE CORPORATION,
a Washington Corporation; DOE
EQUIPMENT OPERATOR; DOES 2-20
and ROE BUSINESS ENTITIES 1-20
inclusive,

Defendants.

STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES – EXPERT DEADLINES ONLY (SECOND REQUEST)

Defendants, Costco Wholesale Corporation (Defendant), by and through their attorneys of record, GEORGE M. RANALLI, ESQ. and MAEGUN C. MOOSO, ESQ. of the law firm RANALLI ZANIEL FOWLER & MORAN, LLC, and Plaintiff, Meizhen Wang (Plaintiff), by and through her attorneys of record CLARK SEEGMILLER, ESQ., of the RICHARD HARRIS LAW FIRM to hereby request this Honorable Court to extend the expert deadlines only as requested herein.

1 **I. LOCAL RULE 6-1 IS SATISFIED**

2 This is the second request for an extension of discovery deadlines filed by the parties.
3 However, this request is only for an extension of experts. This Stipulation and request for
4 extension of discovery dates is made more than twenty-one (21) days before the expiration of
5 the deadline for discovery in this case, which is currently September 30, 2024, with initial
6 experts due July 1, 2024.

7 Pursuant to the controlling Discovery Plan, the following dates govern for purposes of
8 discovery:

- | | |
|--|--------------------|
| 9 1. Discovery Cutoff Date: | September 30, 2024 |
| 10 2. Initial Expert Disclosure: | July 1, 2024 |
| 11 3. Rebuttal Expert Disclosure: | August 2, 2024 |
| 12 4. Dispositive Motions: | October 29, 2024 |
| 13 5. Joint Pre-Trial Order: | November 29, 2024 |

14 This requested extension will not change any deadline other than the current expert
15 deadline and the current rebuttal deadline.

16 The parties have already begun the discovery process including taking relevant
17 depositions, obtaining medical records and bills and conducting discovery amongst the relevant
18 parties. The parties believe that adjusting the expert disclosure deadline by agreement will
19 increase efficiencies in the case and possibly obviating the need for the retention of certain
20 experts. If so, this will decrease the cost of the litigation.

21 According the parties are requesting to extend the expert deadline to September 2, 2024
22 and the rebuttal deadline to September 30, 2024.

23 Based on the foregoing, the parties have agreed to the extension.

24 The instant request comports with Local Rule 6-1, in that no request is made after the
25 expiration of the specified period.

26 **II. THE FOLLOWING DISCOVERY HAS BEEN COMPLETED**

- 27 1. Plaintiff's Initial List of Witnesses and Documents Pursuant to FRCP 26(a);
28 2. Plaintiff's First Supplement to Initial List of Witnesses and Documents Pursuant to
29 FRCP 26(a);

- 1 3. Plaintiff's Second Supplement to Initial List of Witnesses and Documents Pursuant to
- 2 FRCP 26(a);
- 3 4. Plaintiff's Third Supplement to Initial List of Witnesses and Documents Pursuant to
- 4 FRCP 26(a);
- 5 5. Plaintiff's Fourth Supplement to Initial List of Witnesses and Documents Pursuant to
- 6 FRCP 26(a);
- 7 6. Plaintiff's Fifth Supplement to Initial List of Witnesses and Documents Pursuant to
- 8 FRCP 26(a);
- 9 7. Plaintiff's Sixth Supplement to Initial List of Witnesses and Documents Pursuant to
- 10 FRCP 26(a);
- 11 8. Defendant's Disclosure of Witnesses and Exhibits Pursuant to FRCP 26(f);
- 12 9. Defendant's First Supplemental Disclosure of Witnesses and Exhibits Pursuant to FRCP
- 13 26(f);
- 14 10. Defendant's Second Supplemental Disclosure of Witnesses and Exhibits Pursuant to
- 15 FRCP 26(f);
- 16 11. Defendant's Third Supplemental Disclosure of Witnesses and Exhibits Pursuant to
- 17 FRCP 26(f);
- 18 12. Defendant's Fourth Supplemental Disclosure of Witnesses and Exhibits Pursuant to
- 19 FRCP 26(f);
- 20 13. Defendant's Fifth Supplemental Disclosure of Witnesses and Exhibits Pursuant to FRCP
- 21 26(f);
- 22 14. Defendant's First Set of Interrogatories to Plaintiff;
- 23 15. Plaintiff's Responses to Defendant Costco Wholesale Corporation's First Set of
- 24 Interrogatories;
- 22 16. Defendant's Second Set of Interrogatories to Plaintiff;
- 23 17. Plaintiff's Responses to Defendant Costco Wholesale Corporation's Second Set of
- 24 Interrogatories;
- 24 18. Defendant's First Set of Request for Production of Documents to Plaintiff;

- 1 19. Plaintiff's Responses to Defendant Costco Wholesale Corporation's First Set of
2 Requests for Production of Documents;
3 20. Defendant's Second Set of Request for Production of Documents to Plaintiff;
4 21. Plaintiff's Responses to Defendant Costco Wholesale Corporation's Second Set of
5 Requests For Production of Documents;
6 22. Defendant's First Set of Requests for Admissions to Plaintiff;
7 23. Plaintiff's Responses to Defendant Costco Whole Corporation's First Set of Requests for
8 Admissions;
9 24. Defendant's Second Set of Requests for Admissions to Plaintiff;
10 25. Plaintiff's Responses to Defendant Costco Whole Corporation's Second Set of Requests
11 for Admissions;
12 26. Plaintiff's First Set of Interrogatories to Defendant;
13 27. Defendant Costco Wholesale Corporation's Responses to Plaintiff's First Set of
14 Interrogatories;
15 28. Deposition of Fendy Anna Wang;
16 29. Deposition of Leonardo A. Lopez;
17 30. Deposition of Meizhen Wang;

16 Under Local Rule 26-3(d), it is necessary to articulate a proposed schedule for
completing all remaining discovery. The parties are requesting only the expert and rebuttal
17 deadline be extended.

18 The following deadlines are requested.

- | | |
|--|--------------------|
| 1. Discovery Cutoff Date: | September 30, 2024 |
| 2. Amending the Pleadings/Adding Parties | July 1, 2024 |
| 3. Initial Expert Disclosure: | September 2, 2024 |
| 4. Rebuttal Expert Disclosure: | September 30, 2024 |
| 5. Dispositive Motions: | October 29, 2024 |
| 6. Joint Pre-Trial Order: | November 29, 2024 |

1 The parties hereby stipulate to the proposed changes in the discovery deadlines.
2
3

IT IS SO STIPULATED.

4 May 31, 2024

May 31, 2024

5 **RANALLI ZANEL FOWLER & MORAN,
LLC**

RICHARD HARRIS LAW FIRM

6 */s/ George M. Ranalli*

/s/ Clark Seegmiller

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8 **MAEGUN MOOSO, ESQ.**

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10 Attorney for Defendant

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Nevada Bar No. 3873

801 South Fourth Street

Henderson, NV 89101

11 Attorneys for Plaintiff

12
13 **ORDER**
14

15 IT IS HEREBY ORDERED.

16
17 DATED: 6/3/2024

18
19 
20 _____
21 JUDGE BRENDA WEKSLER
22
23
24

From: Mysty D. Langford
To: George Ranalli; Clark Seegmiller
Cc: Maegun Mooso; Ashley Strange
Subject: Re: Wang v. Costco
Date: Friday, May 31, 2024 3:20:07 AM
Attachments: image001.png

Clark indicates you may affix his e-signature.

Mysty D. Langford

Law Clerk

Direct Dial - 702-444-4367

Richard Harris Law Firm



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From: George Ranalli <gmranalli@ranallilawyers.com>

Sent: Thursday, May 30, 2024 1:45 PM

To: Mysty D. Langford <cmlangford@richardharrislaw.com>; Clark Seegmiller <clark@richardharrislaw.com>

Cc: Maegun Mooso <mmooso@ranallilawyers.com>; Ashley Strange <astrange@ranallilawyers.com>

Subject: Wang v. Costco

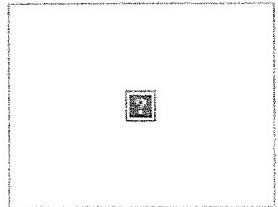
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Hi Clark and Mystic: here is the stip.. Can we use your electronic sig? we just adjusted the expert and rebuttal (per my conversation with Clark). Would like to get this to Court today..Thanks.

Ashley, please follow up with Mystic asap..Thanks.

George M. Ranalli, Partner
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